

EXHIBIT A

Deposition of
Steven Zega
September 09, 2021

Dillard
vs.
City of Springdale

<p>Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF ARKANSAS FAYETTEVILLE DIVISION 2 JILL DILLARD, JESSA SEEWALD, JINGER VUOLO, and JOY DUGGAR, 3 Plaintiffs, 4 vs. No. 5:17-CV-05089-TLB 5 CITY OF SPRINGDALE; WASHINGTON COUNTY; KATHY O'KELLEY; 6 ERNEST CATE; RICK HOYT; STEVE ZEGA; BAUER PUBLISHING 7 COMPANY, L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA GROUP, 8 INC.; BAUER, INC.; HEINRICH BAUER NORTH AMERICA, INC.; 9 BAUER MEDIA GROUP USA, LLC; and DOES 1-10, Inclusive, 10 Defendants.</p> <p>11 VIDEOCONFERENCE DEPOSITION OF STEVEN ZEGA 12 TAKEN ON BEHALF OF THE PLAINTIFFS ON SEPTEMBER 9, 2021, BEGINNING AT 10:03 A.M. 13 ALL PARTIES APPEARING REMOTELY REPORTED BY KERRI PIANALTO, CCR</p> <p>14 APPEARANCES:</p> <p>15 By videoconference on behalf of the PLAINTIFFS</p> <p>16 Steven E. Bledsoe 17 Nicole J. Kim 18 LARSON, LLP 555 South Flower Street, Suite 4400 Los Angeles, California 90071 213-436-4888 sbledsoe@larsonllp.com</p> <p>20 Shawn B. Daniels 21 DANIELS LAW FIRM, PLLC 129 W. Sunbridge Drive 22 Fayetteville, Arkansas 72703 479-521-7000 shawn@danielsfirm.com</p> <p>24 JOB NO. 10087128</p>	<p>Page 3</p> <p>1 INDEX 2 3 Direct Examination by Mr. Bledsoe 4 4 5 EXHIBITS 6 Number Description Page 7 EXHIBIT 29 Washington County Sheriff's Office 17 8 Incident Report 9 EXHIBIT 30 5/15/15 FOIA Request 28 10 EXHIBIT 31 CNN Article 31 11 12 STIPULATIONS 13 It is stipulated that the deposition of STEVEN 14 ZEGA may be taken pursuant to agreement and in accordance 15 with the Federal Rules of Civil Procedure on September 9, 16 2021, before Kerri Pianalto, CCR. 17 18 19 20 21 22 23 24 25</p>
<p>Page 2</p> <p>1 By videoconference on behalf of the DEFENDANTS CITY OF SPRINGDALE, KATHY O'KELLEY AND ERNEST CATE 2 3 Susan Keller Kendall KENDALL LAW FIRM, PLLC 3706 Pinnacle Hills Parkway, Suite 201 4 Rogers, Arkansas 72758 479-464-9828 5 skk@kendalllawfirm.com 6 Thomas N. Kieklak Morgan Doughty 7 HARRINGTON, MILLER, KIEKLAK, EICHMANN & BROWN 4710 S. Thompson, Suite 102 8 Springdale, Arkansas 72764 479-751-6464 9 tkieklak@arkansaslaw.com 10</p> <p>11 By videoconference on behalf of the DEFENDANTS WASHINGTON COUNTY, RICK HOYT AND STEVE ZEGA 12 Jason E. Owens JASON OWENS LAW FIRM, P.A. 13 1023 Main Street, Suite 204 Conway, Arkansas 72032 14 501-764-4334 owens@jowenslawfirm.com 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 4</p> <p>1 WHEREUPON, 2 STEVEN ZEGA, 3 after having been first duly sworn, deposes and says in 4 reply to the questions propounded as follows, to-wit: 5 DIRECT EXAMINATION 6 BY MR. BLEDSOE: 7 Q Mr. Zega, could you state your full name? 8 A Steven Stokely Kenneth Zega. 9 THE COURT REPORTER: I'm sorry, I didn't hear 10 your name, the middle name. 11 A Steven Stokely Kenneth Zega. 12 Q (BY MR. BLEDSOE) Can you tell us your 13 educational background since high school? 14 A I graduated from the University of Arkansas with 15 a bachelor of arts in 1990 and the University of Arkansas 16 School of Law with a JD in 1993 and I have a litany of 17 Army schools if you want to hear about those, military. 18 Q Sure. 19 A Let's see, in 1991, I graduated from the 20 Arkansas Military Academy which is National Guard Officer 21 Candidate School program. In 1993, I graduated from the 22 field artillery officer basic course at Fort Sill, 23 Oklahoma. In 2003 or four, I graduated from the judge 24 advocate general's, JAG, officer's basic course by 25 correspondence. In 2005, I graduated from the judge</p>

<p style="text-align: right;">Page 5</p> <p>1 advocate general's basic advanced course, officer advanced 2 course. In 2009, I graduated from something called the 3 intermediate level education put on by the Army. In 2012, 4 I graduated from the military judge's course at the judge 5 advocate general school. I also, I've gone to other 6 seminars, training, but those are the schools that I have 7 been to for the Army and I'm having trouble recalling 8 anything else at this moment. Of course, lots of CLE. 9 Q Are you still in the Army? 10 A I'm in the National Guard, yes. 11 Q So what is your rank or position? 12 A I'm a colonel and I am officially access -- I 13 was recently the state judge, state military judge. 14 Q I have a brother that served in the Army as a 15 doctor, so I -- who doesn't love the Army, right? 16 All right. Can you walk us through your work 17 background since you graduated from law school in 1993? 18 A Sure. When I graduated from law school, I 19 immediately went to the field artillery officer -- well, 20 that's not true. I spent about three months studying for 21 the bar exam, took the bar exam in July of 1993, the 22 Arkansas bar, and then from July, the end of July of '93 23 to December of '93, I was at the field artillery school in 24 Fort Sill. I spent about two months looking for a 25 civilian job when I returned home and in late January or</p>	<p style="text-align: right;">Page 7</p> <p>1 in 2012 and worked with Steve for another two years before 2 the county judge at the time, Marilyn Edwards, called me 3 and asked me if I was interested in becoming county 4 attorney. The other jobs, plural, that I had during that 5 time, I was on the Washington County Quorum Court from the 6 beginning of 2001 until the end of 2010 minus that 7 deployment to Iraq in 2003 to 2005, and took a leave of 8 absence from the quorum court during that time, and I 9 also, because I don't have enough to do, umpire baseball 10 and I umpire high school baseball around here and I've 11 done that for years, since before I left law school. 12 Those are the things that I can think of that I've done 13 for money since 1993. 14 In 2014, I began the county attorney. I'm 15 sorry, I did not finish answering your question. I didn't 16 become the county attorney in 2014. I accepted the job, I 17 became the county attorney in January of 2015 and held the 18 job until the end of 2016. From January 2017 to 19 September 2017, I was a law clerk for the Honorable Joseph 20 J. Volpe, the United States magistrate judge in Little 21 Rock. I did his habeas work for nine months and then I 22 got offered a position in this firm that I am with now in 23 July or August of 2017 and I've been here ever since. I 24 was an associate for two years and now I'm a partner. 25 Q What's the name of the firm you're working out</p>
<p style="text-align: right;">Page 6</p> <p>1 early February of 1994, I became the deputy prosecuting 2 attorney in the 19th judicial district which includes 3 Benton and Carroll Counties. I held that job from 4 February -- late January of '94 or early February of '94 5 to September of '94. I became an associate at the 6 Lincoln, Arkansas firm of Boyce R. Davis Associates, 7 B-o-y-c-e, R. Davis Associates. I was an associate in 8 that firm from 1994 to 1999. In 1999, I became a partner 9 of the firm. We renamed the firm Davis and Zega, PLC. I 10 remained in that firm from '99 until 2006. In the 11 meantime, I deployed for the first time to Iraq. So in 12 October of 2003, I got called and we spent six months 13 training up, essentially, in Little Rock, Fort Hood and 14 Fort Sill -- I mean, not Fort Sill, Fort Polk, Louisiana, 15 spent ten months in the Middle East in Kuwait and Iraq, 16 got back in December of '05, spent four months demobbing 17 the 39th Infantry Brigade, demobilized the 39th Infantry 18 Brigade, went to -- spent a month on leave from the Army 19 and went back to work with Boyce. We hired an associate 20 and that firm -- that firm then became Davis, Parker & 21 Zega, PLC. I was there for four years. In 2010, Steve 22 Parker and I left and went to Prairie Grove, formed a firm 23 called Parker & Zega, PLC, was in that firm for a year 24 before I got called to Iraq again, spent basically 25 calendar year 2011 on active duty orders again, came home</p>	<p style="text-align: right;">Page 8</p> <p>1 of now? 2 A Crouch, Harwell, Fryar & Ferner, PLLC. 3 THE COURT REPORTER: Mr. Bledsoe, there's a 4 really bad echo when you speak. 5 MR. OWENS: I think someone -- I think someone 6 just joined and needs to mute probably. 7 MS. KENDALL: This is Susan Kendall and I -- 8 it's Susan Kendall, but I was muted, but it's Susan 9 Kendall. I'm going to mute again and see if that helps. 10 MR. KIEKLAK: Hi Susan. 11 MS. KENDALL: Hi there. 12 MR. BLEDSOE: Let's go off -- is this any 13 better? 14 THE COURT REPORTER: Yes. 15 Q (BY MR. BLEDSOE) Okay. Is the county attorney 16 an appointed position or elected position? 17 A Appointed. 18 Q And who appointed you as county attorney 19 beginning in January of 2015? 20 A County Judge Marilyn Edwards. There was a -- 21 she's a former county judge. At the time there was a 22 confirmation process through the quorum court as well. 23 Q And were you appointed for a certain term? 24 A No. 25 Q When you were appointed as county attorney, was</p>

<p style="text-align: right;">Page 9</p> <p>1 it an open-ended position?</p> <p>2 A It was at the pleasure of the county judge.</p> <p>3 Q Okay. What were your duties and</p> <p>4 responsibilities as the Washington County attorney?</p> <p>5 A Basically, I was the civil attorney for the</p> <p>6 county. I handled everything that wasn't a criminal</p> <p>7 matter with some exceptions. So, for example, there was</p> <p>8 no such thing as a typical day. I would in a given week,</p> <p>9 I would write ordinances, write resolutions, I would</p> <p>10 provide on-the-spot advice to county officials, elected</p> <p>11 officials and their deputies who needed or wanted legal</p> <p>12 advice. I was involved heavily in human resources issues.</p> <p>13 I was required on four or five occasions to conduct -- to</p> <p>14 be the investigator in the human resource complaints. Any</p> <p>15 civil rights litigation that the county was involved in,</p> <p>16 especially in the jail, the Association of Counties</p> <p>17 handled, I would try to monitor that, but I wasn't</p> <p>18 involved in actually litigating it. I did some litigation</p> <p>19 for the county. I assisted in some litigation when the</p> <p>20 county judge was sued in a civil rights case, that was</p> <p>21 kind of an unusual thing, that didn't happen a whole lot</p> <p>22 and so she wanted me personally involved in that so I</p> <p>23 entered an appearance in that case. I would do some law</p> <p>24 enforcement training on -- for the law enforcement, the</p> <p>25 part time to law enforcement certification class the</p>	<p style="text-align: right;">Page 11</p> <p>1 A Yes.</p> <p>2 Q Why did you leave the county attorney's -- or</p> <p>3 withdrawn.</p> <p>4 Why did you leave your position as county</p> <p>5 attorney in December of 2016?</p> <p>6 A I was fired.</p> <p>7 Q By whom?</p> <p>8 A The county judge elect, Joseph Wood. He was a</p> <p>9 county judge elect at the time. He's the county judge</p> <p>10 now.</p> <p>11 Q And did Mr. Wood ever tell you why he fired you</p> <p>12 in December of 2016?</p> <p>13 A Mr. Wood did not communicate his reasons to me</p> <p>14 directly. I found some other things out, but, no is the</p> <p>15 answer to your question.</p> <p>16 Q When you say you found some other things out,</p> <p>17 what did you find out about why County Judge Elect Joseph</p> <p>18 Wood fired you in December of 2016?</p> <p>19 A I'm a Democrat and he's a Republican. He had a</p> <p>20 Republican attorney that he wanted to appoint. That</p> <p>21 gentleman he did appoint -- he offered the job to him --</p> <p>22 he offered the job to my successor before he won the</p> <p>23 election and when he won the election, he, you know,</p> <p>24 confirmed his offer of the job to him and that gentleman</p> <p>25 took the job.</p>
<p style="text-align: right;">Page 10</p> <p>1 sheriff's office put on. I attended almost every</p> <p>2 committee meeting of the quorum court, I attended all the</p> <p>3 planning meetings from the planning commission, read</p> <p>4 contracts, reviewed contracts, wrote some contracts. I</p> <p>5 did a lot of stuff.</p> <p>6 Q Did you have other attorneys on staff that</p> <p>7 worked for you or under your direction?</p> <p>8 A I didn't have anyone -- I was a one-person show</p> <p>9 as far as the attorney. About four or five months into my</p> <p>10 tenure as county attorney I hired a woman named Lainey</p> <p>11 Miller to be my assistant. My previous assistant got</p> <p>12 promoted out of her position. Lainey is a licensed</p> <p>13 attorney, but she was my assistant, so I would use</p> <p>14 Lainey's legal training to do things like proof my memos</p> <p>15 and opinions and, you know, run behind me and see if I had</p> <p>16 cited everything correctly, that kind of thing.</p> <p>17 Q But she was not hired in the capacity as a</p> <p>18 lawyer for the county; is that correct?</p> <p>19 A That's correct.</p> <p>20 Q Was one of the entities to which you provided</p> <p>21 legal advice the county sheriff's department?</p> <p>22 A Yes.</p> <p>23 Q In your position as Washington County attorney,</p> <p>24 did you have the occasion to provide legal advice with</p> <p>25 respect to FOIA requests that were sent to the county?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q What were your responsibilities as Washington</p> <p>2 county attorney in connection with FOIA requests made to</p> <p>3 the county?</p> <p>4 A So it varied depending on the request. When I</p> <p>5 became aware of a particular request, I would provide</p> <p>6 guidance directly to the person who asked me the question.</p> <p>7 In other words, if we got a request to the county judge's</p> <p>8 office in particular and the county judge's office was the</p> <p>9 custodian of the records, whoever got the request, and</p> <p>10 that might have been Judge Edwards herself, it might have</p> <p>11 been her executive assistant, would bring me the request</p> <p>12 and say, how do we answer this? And I would assist them</p> <p>13 in formulating the answer. When it came to -- in</p> <p>14 particular, when it came to the sheriff's office, I rarely</p> <p>15 before this incident saw FOIA requests made to the</p> <p>16 sheriff's office.</p> <p>17 Q During the time that you were the county</p> <p>18 attorney, was there a policy that when a FOIA request came</p> <p>19 into the county that the department or county entity that</p> <p>20 received the FOIA request was supposed to get legal advice</p> <p>21 from you --</p> <p>22 A There was not a policy -- there was not a</p> <p>23 policy. I attempted to -- I encouraged through a couple</p> <p>24 of e-mails and a couple face-to-face visits that that's</p> <p>25 what they should do, but there was not a formal policy to</p>

<p style="text-align: right;">Page 13</p> <p>1 that effect, no.</p> <p>2 Q So from the time you were county attorney, is it</p> <p>3 true that you would provide legal advice and respond to</p> <p>4 FOIA requests when you were asked to do so by the</p> <p>5 particular county entity who received the FOIA request?</p> <p>6 A That evolved, Mr. Bledsoe. Probably a year into</p> <p>7 my tenure as county attorney, the county purchased --</p> <p>8 entered into a contract with an entity that provided us</p> <p>9 with a portal, a web-based portal, to make Freedom of</p> <p>10 Information Act requests. I was -- I don't know if I was</p> <p>11 an administrator in that portal, but I had -- I had access</p> <p>12 to the portal full time so I would see web-based requests</p> <p>13 as part of my daily whatever and part of what I did at</p> <p>14 that time, once those web-based requests started coming in</p> <p>15 is I would follow up to make sure that we had responded to</p> <p>16 the requester. There are, you know, time limitations on</p> <p>17 when you're supposed to get to somebody what they've asked</p> <p>18 for and so part of what I tried to do was to make sure we</p> <p>19 were tracking -- that the county was tracking the --</p> <p>20 whether we closed out requests on time or not and I would</p> <p>21 also look at that web-based portal to see if there were</p> <p>22 what I considered to be particularly troublesome or</p> <p>23 controversial, you know, exemptible Freedom of Information</p> <p>24 Act requests that would require us to either deny the</p> <p>25 request or to redact a bunch of things from requested</p>	<p style="text-align: right;">Page 15</p> <p>1 A I don't know is the best answer to that</p> <p>2 question. It varied from department to department and it</p> <p>3 varied from elected official to elected official.</p> <p>4 Q Prior to the end of May 2015, had the county</p> <p>5 implemented any training system for how to respond to FOIA</p> <p>6 requests?</p> <p>7 A I'm not aware of any.</p> <p>8 Q And is it true as of May 2015, in your position</p> <p>9 as county attorney you would offer legal advice in</p> <p>10 connection with the FOIA requests when you were asked to</p> <p>11 do so by individuals at a county agency or division, but</p> <p>12 otherwise that's not something that you would do?</p> <p>13 A Again, that involved depending on my awareness</p> <p>14 of the request. Here's what I mean by that. In May of</p> <p>15 2015, that's definitely true. If I wasn't the person who</p> <p>16 got the request personally, then it was a passive system</p> <p>17 for me where someone would come to me and ask for advice.</p> <p>18 When we implemented the web-based portal, I was monitoring</p> <p>19 -- I was trying to actively monitor those requests and</p> <p>20 stay on top of them and would volunteer advice when I</p> <p>21 perceived a particular request to maybe be controversial</p> <p>22 or troublesome.</p> <p>23 Q So as -- withdrawn. We're hearing the feedback.</p> <p>24 A Is it me?</p> <p>25 Q Well, if you have a -- happen to have a cell</p>
<p style="text-align: right;">Page 14</p> <p>1 documents.</p> <p>2 THE COURT REPORTER: Mr. Bledsoe, can we go off</p> <p>3 the record for a minute?</p> <p>4 (Short break from 10:22 a.m. to 10:24 a.m.)</p> <p>5 Q (BY MR. BLEDSOE) Is it your best recollection,</p> <p>6 Mr. Zega, that the web-based portal system you just</p> <p>7 described was implemented about a year after you became</p> <p>8 county attorney, so sometime in early 2016?</p> <p>9 A Early 2015, yes. That's my recollection.</p> <p>10 Q You testified earlier you became city attorney</p> <p>11 beginning in January 2015?</p> <p>12 A You're right, you're right. It would have been</p> <p>13 2016. I got fired in -- at the end of 2016. My</p> <p>14 apologies, you're correct.</p> <p>15 Q No, it's okay. Just so we have a clear record,</p> <p>16 is it true that your best recollection that the web-based</p> <p>17 portal system for tracking and addressing FOIA requests</p> <p>18 that was implemented by the county was implemented about a</p> <p>19 year after you started, so sometime in early 2016?</p> <p>20 A Late 2015 or early 2016, yes, sir. And Mr. -- I</p> <p>21 want to be clear, you know, not all FOIA requests came</p> <p>22 through that portal. That was just a way to manage some</p> <p>23 requests.</p> <p>24 Q What was the county's method for handling FOIA</p> <p>25 requests in the May 2015 time frame?</p>	<p style="text-align: right;">Page 16</p> <p>1 phone that's on or something close to the computer,</p> <p>2 sometimes that will cause a problem, but I'm not going to</p> <p>3 accuse anybody.</p> <p>4 A I turned everything off except for my, you know,</p> <p>5 my computer.</p> <p>6 Q Okay. All right. Let's -- I want to focus just</p> <p>7 on May 2015. So I do understand that your system changed</p> <p>8 either in late 2015 or early 2016, but I just want to ask</p> <p>9 about the system in May 2015, okay?</p> <p>10 A Yes, sir.</p> <p>11 Q Is it true that as of May 2015 in connection</p> <p>12 with your position as the county attorney, you would</p> <p>13 provide legal advice with respect to FOIA requests only</p> <p>14 when you were asked by someone in the county who had</p> <p>15 received a FOIA request, correct?</p> <p>16 A That is correct.</p> <p>17 Q And as of May 2015, there was not a system in</p> <p>18 place where recipients of FOIA requests were supposed to</p> <p>19 ask you for legal advice in connection with those</p> <p>20 requests, correct?</p> <p>21 A That's correct.</p> <p>22 Q So before we talk about the specific FOIA</p> <p>23 request that's at issue or requests that are at issue in</p> <p>24 this case, I want to ask you some questions just about the</p> <p>25 Duggar family, okay?</p>

<p style="text-align: right;">Page 17</p> <p>1 A Okay.</p> <p>2 Q Prior to May 20, 2015, did you know any of the</p> <p>3 Duggars personally?</p> <p>4 A Very, very casually, yes.</p> <p>5 Q Okay. Can you tell us which of the Duggars you</p> <p>6 knew and how you knew them prior to May 20, 2015?</p> <p>7 A I knew Jim Bob and Michelle. The quorum court</p> <p>8 is an elected position. Jim Bob was a state</p> <p>9 representative for some time so sometimes they would be at</p> <p>10 election watch parties that I would also be at. The very</p> <p>11 most interaction personally I ever had with either Jim Bob</p> <p>12 or Michelle was a handshake to say I'm Steve Zega.</p> <p>13 Q So you wouldn't characterize yourself as being</p> <p>14 friends with the Duggars prior to May 20, 2015, correct?</p> <p>15 A That's correct.</p> <p>16 Q And did you have any animosity towards the</p> <p>17 Duggars as of May 20, 2015?</p> <p>18 A I disagree with them politically and</p> <p>19 theologically, Mr. Bledsoe, but personal animosity, no.</p> <p>20 This is a, you know -- no.</p> <p>21 Q All right. Let me refer you to a document</p> <p>22 that's been premarked as Exhibit 29.</p> <p>23 (WHEREUPON, Exhibit 29 was marked for</p> <p>24 identification.)</p> <p>25 A All right.</p>	<p style="text-align: right;">Page 19</p> <p>1 you first saw the Washington County Sheriff's Office</p> <p>2 incident report that's been marked as Exhibit 29?</p> <p>3 A My recollection is that Matt Durrett, who was</p> <p>4 and remains the elected prosecuting attorney for the</p> <p>5 Fourth Judicial District, which is Washington and Madison</p> <p>6 Counties, texted me, e-mailed me or called me and asked me</p> <p>7 to review the report and provide guidance on whether we</p> <p>8 should release the report in the first place and whether</p> <p>9 we should continue to release it in response to more FOIA</p> <p>10 requests.</p> <p>11 Q And do you recall what date that happened?</p> <p>12 A No, sir. I know that I was in Little Rock</p> <p>13 actually on National Guard duty, North Little Rock on</p> <p>14 National Guard duty and I think, but I do not recall</p> <p>15 specifically, that it was the third week of May of 2015.</p> <p>16 Q Okay. So is it true that Matt Durrett, the</p> <p>17 prosecuting attorney, either texted, e-mailed or called</p> <p>18 you after the county had released the incident report in</p> <p>19 response to a FOIA request and asked you in words or</p> <p>20 substance, you know, to advise whether the report had been</p> <p>21 properly released in the first instance and whether the</p> <p>22 county should continue to release the report; is that</p> <p>23 correct?</p> <p>24 A That is my recollection, yes. I know Matt and I</p> <p>25 had multiple conversations about this particular topic and</p>
<p style="text-align: right;">Page 18</p> <p>1 Q It's the Washington County Sheriff's Office</p> <p>2 incident report.</p> <p>3 A Okay, I have it up.</p> <p>4 Q You see Exhibit 29 is a Washington County</p> <p>5 Sheriff's Office incident report. It's Bates numbered --</p> <p>6 well, it's actually not Bates numbered. At the bottom it</p> <p>7 says, "Form Incidents WCSO," and it's a four page</p> <p>8 document. Do you see that?</p> <p>9 A Yes.</p> <p>10 Q When is the first time you saw a copy of the</p> <p>11 Washington County Sheriff's Office incident report which</p> <p>12 has been marked as Exhibit 29?</p> <p>13 A May of 2015.</p> <p>14 Q Do you recall whether you saw a copy of the</p> <p>15 incident report prior to the time it was released?</p> <p>16 A Yes.</p> <p>17 Q Pursuant to the FOIA request?</p> <p>18 A Yes, I recall, and, no, I did not see it before</p> <p>19 then.</p> <p>20 Q Okay. In May of 2015, did you ever see an</p> <p>21 unredacted copy of the incident report that's been marked</p> <p>22 as Exhibit 29?</p> <p>23 A I don't know. I know I have seen an unredacted</p> <p>24 copy, but I don't know if I saw one in May.</p> <p>25 Q Okay. What were the circumstances under which</p>	<p style="text-align: right;">Page 20</p> <p>1 I'm pretty sure I first learned about this from Matt.</p> <p>2 Q Did you do legal research to determine whether</p> <p>3 the county had properly released the incident report in</p> <p>4 the first place pursuant to the incident -- the FOIA</p> <p>5 request?</p> <p>6 A Yes.</p> <p>7 Q And what research did you do?</p> <p>8 A I looked at statutes.</p> <p>9 Q Anything else?</p> <p>10 A I may have read some AG's opinions and some</p> <p>11 FOIA, Arkansas FOIA case law, but I was focused on</p> <p>12 statutory exceptions to the Freedom of Information Act.</p> <p>13 Q Do you recall which statutes you looked at?</p> <p>14 A Initially, I looked at the Arkansas Child</p> <p>15 Maltreatment Act codified at Arkansas code annotated</p> <p>16 12-18-101, et seq.</p> <p>17 Q Do you recall any other statutes?</p> <p>18 A Not initially. Later on, much later on and I</p> <p>19 can't remember where I learned this, I learned that this</p> <p>20 report formed the basis of a family in need of services</p> <p>21 petition in juvenile court and I can't remember if someone</p> <p>22 asked me to give an opinion about whether the Arkansas</p> <p>23 juvenile code, and I'm not sure exactly what -- which</p> <p>24 statute this is, but it's in Title 9, Chapter 27 of the</p> <p>25 Arkansas juvenile code prohibited the release of the</p>

<p style="text-align: right;">Page 21</p> <p>1 report as well, but that was weeks, if not months, after</p> <p>2 May of 2015.</p> <p>3 Q After Mr. Durrett --</p> <p>4 THE COURT REPORTER: I'm sorry, I just can't</p> <p>5 understand you. That feedback is bad.</p> <p>6 Q (BY MR. BLEDSOE) Well, we'll try again. Did</p> <p>7 you respond to Mr. Durrett's question concerning whether</p> <p>8 the report had been properly released in the first</p> <p>9 instance and whether the county should continue to release</p> <p>10 the report?</p> <p>11 A I did.</p> <p>12 Q Do you recall when you responded to</p> <p>13 Mr. Durrett's questions?</p> <p>14 A No.</p> <p>15 Q What did you tell Mr. Durrett in response to</p> <p>16 questions he raised with you concerning whether the report</p> <p>17 had been properly released in the first instance and</p> <p>18 whether the county should continue to release the report?</p> <p>19 A It was my opinion that we should not have</p> <p>20 released the report in the first instance and that we</p> <p>21 would not continue, on my advice, to release it to anyone</p> <p>22 else, we would deny further requests.</p> <p>23 Q And why did you reach those conclusions?</p> <p>24 A My read of the Arkansas Child Maltreatment Act</p> <p>25 together with this report led me to the conclusion that</p>	<p style="text-align: right;">Page 23</p> <p>1 you to look into those issues?</p> <p>2 MR. OWENS: Object to form.</p> <p>3 A Jason, do you want me answer the question?</p> <p>4 MR. OWENS: Yes, unless I instruct you</p> <p>5 otherwise.</p> <p>6 A Thank you.</p> <p>7 Mr. Bledsoe, I don't remember because the legal</p> <p>8 research was one component of solving this problem and the</p> <p>9 legal research, I don't remember whether I settled across</p> <p>10 the Arkansas Child Maltreatment Act on my own or whether</p> <p>11 Matt directed me to it specifically and that would drive</p> <p>12 part of the answer to your question. This was a</p> <p>13 comprehensive problem-solving exercise in which -- for me</p> <p>14 in which legal research was one component because although</p> <p>15 I did not personally know the Duggars, I knew they were --</p> <p>16 I knew that they had a television program, I knew that</p> <p>17 they were celebrities, and given the contents of this</p> <p>18 particular report, I recognized that it had the potential</p> <p>19 to be a really, really big deal, and so part of what I did</p> <p>20 was read the report, analyze the contents of the report.</p> <p>21 I don't know whether Matt told me because this is -- what</p> <p>22 you showed me is redacted, whether he told me this</p> <p>23 involved the Duggars or not. I learned it very shortly</p> <p>24 thereafter. And so part of the back and forth was should</p> <p>25 we have released it under the Freedom of Information Act.</p>
<p style="text-align: right;">Page 22</p> <p>1 this was a report of child maltreatment as defined in the</p> <p>2 statute and this was a document record data compilation</p> <p>3 that was not just exempt from disclosure, but prohibited</p> <p>4 from disclosure and that, you know, the statute</p> <p>5 specifically refers to the Arkansas Freedom of Information</p> <p>6 Act and says it's not -- you're not to release it pursuant</p> <p>7 to the Arkansas Freedom of Information Act and there is</p> <p>8 a -- you know, finally in that analysis I read through</p> <p>9 chapter two of the Child Maltreatment Act and there is a</p> <p>10 criminal prohibition, it's a misdemeanor to release these</p> <p>11 records that qualify as child maltreatment records</p> <p>12 unlawfully.</p> <p>13 Q How many hours of legal research did it take you</p> <p>14 to reach those conclusions?</p> <p>15 A I don't remember.</p> <p>16 Q Was it an hour or two or was it something that</p> <p>17 took you all day, what's your best estimate?</p> <p>18 A I don't know --</p> <p>19 MR. OWENS: Object to form.</p> <p>20 A -- Mr. Bledsoe.</p> <p>21 Sorry, Jason.</p> <p>22 Q (BY MR. BLEDSOE) Can you estimate for me how</p> <p>23 long it took you to reach the conclusion that the report</p> <p>24 should not have been released and that the county should</p> <p>25 not continue to release the report after Mr. Durrett asked</p>	<p style="text-align: right;">Page 24</p> <p>1 You know, I like to go back every time I get a FOIA</p> <p>2 request that I think might be controversial and read the</p> <p>3 act itself and then read the Arkansas Child Maltreatment</p> <p>4 Act and there was a multifaceted approach to this issue,</p> <p>5 not only was it -- you know, should we have released it in</p> <p>6 the first place and should we continue to release it, is</p> <p>7 what do we do now that it has been released and those were</p> <p>8 all things that were on my mind. I do not remember how</p> <p>9 much time and can't answer the question intelligently how</p> <p>10 much time I spent on legal research. I will tell you that</p> <p>11 the United States Army had me on orders for a week, five</p> <p>12 days at Fort -- at Camp Robinson and they did not get</p> <p>13 their money's worth out of me that week because I</p> <p>14 basically dealt with this issue that entire week. I</p> <p>15 remember that distinctly.</p> <p>16 Q (BY MR. BLEDSOE) Is it true that if the</p> <p>17 sheriff's office had asked you prior to releasing the</p> <p>18 report whether they should release the incident report in</p> <p>19 response to the FOIA request that you would have told</p> <p>20 them, no, they should not release the report?</p> <p>21 A I don't know.</p> <p>22 MR. OWENS: Form.</p> <p>23 A I don't know.</p> <p>24 Q (BY MR. BLEDSOE) In your position as county</p> <p>25 attorney, what would you have done if the sheriff's office</p>

<p style="text-align: right;">Page 25</p> <p>1 prior to releasing the report had sought your legal advice</p> <p>2 concerning whether to release the incident report in</p> <p>3 response to the FOIA request?</p> <p>4 MR. OWENS: Object to the form.</p> <p>5 A I'm sorry.</p> <p>6 MR. OWENS: I was just registering my objection,</p> <p>7 Steve. Go ahead.</p> <p>8 A Thank you. I would have done legal research and</p> <p>9 much like I did with the after-the-fact question because</p> <p>10 my recollection of Matt's question to me was twofold, did</p> <p>11 we do right in the first place and can we continue to</p> <p>12 release it. Should we release it is the same question as</p> <p>13 the second part of Matt's question. I would have done the</p> <p>14 legal research, that would have been my first step.</p> <p>15 Q (BY MR. BLEDSOE) And when you did the legal --</p> <p>16 actually did the legal research, your conclusion was, no,</p> <p>17 the report should not have been released, correct?</p> <p>18 A That is correct.</p> <p>19 Q Did anyone from the county sheriff's department</p> <p>20 or anyone else from the county ask you in your position as</p> <p>21 county attorney whether the Washington County Sheriff's</p> <p>22 Office incident report which has now been marked</p> <p>23 Exhibit 29 should have been released in response to the</p> <p>24 FOIA request prior to the time they released it?</p> <p>25 A Not before it was released, no.</p>	<p style="text-align: right;">Page 27</p> <p>1 the sheriff's department who worked on the FOIA request</p> <p>2 with regard to the incident report?</p> <p>3 A My two contacts primarily at the sheriff's</p> <p>4 office for this were Major Rick Hoyt and Public</p> <p>5 Information Officer Kelly Cantrell. I do not know the</p> <p>6 names of the clerks and still don't know the names of the</p> <p>7 clerks or clerk who handled this particular request.</p> <p>8 Q You testified earlier that with respect to the</p> <p>9 incident report, you understood because the Duggars had a</p> <p>10 TV show that this was going to be a big or important</p> <p>11 issue. Do you recall that generally?</p> <p>12 A Yes, sir.</p> <p>13 Q And was there any policy within Washington</p> <p>14 County if there was a FOIA request that was going to</p> <p>15 involve big or important or sensitive issues that those</p> <p>16 should be run by the county attorney prior to releasing</p> <p>17 information in connection with those types of FOIA</p> <p>18 requests?</p> <p>19 A No.</p> <p>20 MR. OWENS: Object to form.</p> <p>21 Q (BY MR. BLEDSOE) As part of your review of how</p> <p>22 the incident report in this case got released, did you</p> <p>23 learn who at the county processed the FOIA request and who</p> <p>24 made the decision, for example, to release the incident</p> <p>25 report?</p>
<p style="text-align: right;">Page 26</p> <p>1 Q After the release of the incident report, did</p> <p>2 you conduct any investigation to determine how it happened</p> <p>3 that the report was released without -- withdrawn.</p> <p>4 After the release of the incident report, did</p> <p>5 you conduct any investigation to determine how it occurred</p> <p>6 that the report was released without anyone asking for</p> <p>7 your legal advice?</p> <p>8 A Yes.</p> <p>9 Q What did you find out?</p> <p>10 A That the sheriff's office has or had two</p> <p>11 full-time employees, civilian employees, who do nothing</p> <p>12 but process FOIA requests and that if I personally laid</p> <p>13 eyes on every request and passed on their legal</p> <p>14 sufficiency, I would do nothing else in my capacity as</p> <p>15 county attorney. So because the Freedom of Information</p> <p>16 Act in Arkansas and the case law around the Freedom of</p> <p>17 Information Act in Arkansas provides that disclosure is</p> <p>18 the rule and nondisclosure is the exception and that</p> <p>19 narrowly tailored statutory exceptions exist and you must</p> <p>20 rely upon one of those narrowly tailored statutory</p> <p>21 exceptions in order to refuse a FOIA request, that they</p> <p>22 process five or six or eight or a dozen of these things a</p> <p>23 day, FOIA requests in general, and didn't run it by me</p> <p>24 because they didn't see any reason to run it by me.</p> <p>25 Q As far as you know, who were the employees in</p>	<p style="text-align: right;">Page 28</p> <p>1 A As I said earlier, Mr. Bledsoe, I don't know the</p> <p>2 clerk who worked on this. I know that at some point Rick</p> <p>3 Hoyt had something to do with it, but I'm not sure exactly</p> <p>4 what it was.</p> <p>5 Q Do you know, for example, who made the</p> <p>6 redactions to this report prior to the time it was</p> <p>7 released?</p> <p>8 A I do not.</p> <p>9 Q Let me refer you to the FOIA request from the</p> <p>10 Cross Gunter law firm dated May 15, 2015. It's been</p> <p>11 marked as Exhibit 30 in this case.</p> <p>12 (WHEREUPON, Exhibit 30 was marked for</p> <p>13 identification.)</p> <p>14 A Okay.</p> <p>15 Q You see Exhibit 30 is a FOIA request from the</p> <p>16 Cross Gunter law firm dated May 15, 2015 addressed to the</p> <p>17 records division of the Washington County Sheriff's</p> <p>18 Office?</p> <p>19 A I do.</p> <p>20 Q When is the first time you saw a copy of this</p> <p>21 FOIA request?</p> <p>22 A Yesterday.</p> <p>23 Q You said yesterday?</p> <p>24 A Yes, sir.</p> <p>25 Q So is it true that you never saw a copy of the</p>

<p style="text-align: right;">Page 29</p> <p>1 FOIA request that the Cross Gunter law firm sent to the</p> <p>2 Washington County Sheriff's Office in the May 2015 time</p> <p>3 frame, correct?</p> <p>4 A Not this one, Mr. Bledsoe. I saw I think one or</p> <p>5 two after this, much later when it appeared that they were</p> <p>6 -- Abtin Mehdizadegan, the attorney whose name appears on</p> <p>7 this request, was looking for other things involving the</p> <p>8 Duggars, but those happened July, August, September of</p> <p>9 2015. This -- this exhibit, the first time I saw it was</p> <p>10 yesterday when Mr. Owens forwarded it to me, Mr. Owen</p> <p>11 rather.</p> <p>12 Q After you advised Matt Durrett that --</p> <p>13 THE COURT REPORTER: I didn't catch that,</p> <p>14 Mr. Bledsoe, sorry.</p> <p>15 MR. BLEDSOE: Pardon me?</p> <p>16 THE COURT REPORTER: I didn't hear the first</p> <p>17 part.</p> <p>18 MR. BLEDSOE: Sure.</p> <p>19 Q (BY MR. BLEDSOE) After you advised Matt Durrett</p> <p>20 that the county should not have released the incident</p> <p>21 report in response to the May 15, 2015 FOIA request and</p> <p>22 that it should not continue to release the incident</p> <p>23 report, did the county, in fact, follow your advice and</p> <p>24 stop any further release of the incident report which has</p> <p>25 been marked Exhibit 29?</p>	<p style="text-align: right;">Page 31</p> <p>1 A No.</p> <p>2 Q And why did you implement those changes after</p> <p>3 the release of the incident report in response to the FOIA</p> <p>4 request in May of 2015?</p> <p>5 A Because it was my belief that we had made a,</p> <p>6 what I call a hustle mistake, a good faith mistake in</p> <p>7 releasing this and that we needed not to repeat that</p> <p>8 mistake.</p> <p>9 Q Let me refer you to -- now, this is an article</p> <p>10 that we circulated this morning. Its been marked</p> <p>11 Exhibit 31. Did you get a copy of that, Mr. Zega?</p> <p>12 (WHEREUPON, Exhibit 31 was marked for</p> <p>13 identification.)</p> <p>14 A No, I did not.</p> <p>15 MR. BLEDSOE: Jason, can you shoot him an e-mail</p> <p>16 with that?</p> <p>17 MR. OWENS: I'm sorry, you said Exhibit 31. I</p> <p>18 think I only saw 29 and 30.</p> <p>19 MR. BLEDSOE: Nicole circulated an e-mail about</p> <p>20 15 minutes before the deposition. It's just a CNN article</p> <p>21 that Mr. Zega --</p> <p>22 MR. OWENS: Okay. Let me see. Oh, here it is.</p> <p>23 A Okay.</p> <p>24 Q (BY MR. BLEDSOE) Mr. Zega, let me know when you</p> <p>25 have a copy of the CNN news article which has been marked</p>
<p style="text-align: right;">Page 30</p> <p>1 A As far as I know, it did.</p> <p>2 Q After the release of the incident report in</p> <p>3 May 2015 in response to the Cross Gunter FOIA request, did</p> <p>4 the county change its policies with respect to how to deal</p> <p>5 with FOIA requests?</p> <p>6 A Yes.</p> <p>7 Q What are you referring to?</p> <p>8 A The web portal that I mentioned is one of the --</p> <p>9 one of the changes we made that would allow me to have at</p> <p>10 least passive visibility of freedom of information</p> <p>11 requests. The public information officer at -- Kelly</p> <p>12 Cantrell at the sheriff's office, anything that remotely</p> <p>13 had a child, an incident report or anything else that the</p> <p>14 sheriff's office handled that involved a child victim,</p> <p>15 survivor, witness, she ran it by me. There was no</p> <p>16 formal -- I didn't issue a memorandum. I did -- as I</p> <p>17 said, I think I sent out a couple e-mails that said please</p> <p>18 run any FOIA requests by me that you think -- you know,</p> <p>19 and I don't know if I set out my criteria, but please</p> <p>20 bring FOIA requests to me, and, in particular, I held at</p> <p>21 least one and maybe two meetings with command staff and</p> <p>22 Kelly Cantrell at the sheriff's office in which I in</p> <p>23 person said this is how we need to handle this going</p> <p>24 forward.</p> <p>25 Q Any other changes you can recall?</p>	<p style="text-align: right;">Page 32</p> <p>1 Exhibit 31.</p> <p>2 A Okay.</p> <p>3 Q I'm really just going to ask you some questions</p> <p>4 about the first couple of paragraphs.</p> <p>5 MR. OWENS: I just sent it to you by e-mail,</p> <p>6 Steven.</p> <p>7 THE WITNESS: Okay.</p> <p>8 MR. BLEDSOE: Well, why don't -- let's take our</p> <p>9 first -- you know, let's take a ten minute break. I think</p> <p>10 when we come back it will be the last session. Let's take</p> <p>11 a ten minute break, take a moment to review the article</p> <p>12 and we'll come back and we'll do our last session, okay?</p> <p>13 (Short break from 10:59 a.m. to 11:13 a.m.)</p> <p>14 Q (BY MR. BLEDSOE) Mr. Zega, do you have a copy</p> <p>15 of the news article which is marked as Exhibit 31 in front</p> <p>16 of you?</p> <p>17 A Yes.</p> <p>18 Q You see the article is from money.CNN.com and</p> <p>19 it's dated June 4th, 2015. Do you see that?</p> <p>20 A Yes.</p> <p>21 Q The article is entitled, "Duggar records</p> <p>22 shouldn't have been released, Arkansas official says." Do</p> <p>23 you see that?</p> <p>24 A Yes.</p> <p>25 Q It reads, at least the first two paragraphs,</p>

<p style="text-align: right;">Page 33</p> <p>1 "Police records about Josh Duggar's history of molestation 2 should not have been released an Arkansas County official 3 said Thursday. 'If I could build a time machine, this 4 wouldn't have come out in the first place,' Washington 5 County Attorney Steven Zega told CNNMoney." Do you see 6 that? 7 A Yes. 8 Q Did you tell a reporter from CNN on about 9 June 4th, 2015 that, "If I could build a time machine, 10 this wouldn't have come out in the first place?" 11 A I think so. 12 Q And the "this" you were referring to was the 13 incident report that was released by the county, correct? 14 A Yes. 15 Q Is it true that the incident report would not 16 have been released if the sheriff's department had asked 17 you ahead of time? 18 MR. OWENS: Object to form. 19 A I don't know, Mr. Bledsoe. Even when I was 20 county attorney, my clients didn't always follow my 21 advice. 22 Q (BY MR. BLEDSOE) Is it true that if the 23 sheriff's department had asked you ahead of time whether 24 to release the incident report, you would have told them 25 not to release it?</p>	<p style="text-align: right;">Page 35</p> <p>1 because this is Arkansas law, is to release records and if 2 they don't release them, to have a narrow exception based 3 in statute to release. What I understood with this 4 particular -- to not release, rather. What I understood 5 to have happened with this was it was treated as a routine 6 FOIA request and that -- the sheriff's office treated it 7 as a routine FOIA request, that because the subject matter 8 of the request involved sexual assault, they redacted 9 information relating to the people involved. 10 Q Did you learn anything else as part of your 11 investigation? 12 A I probably did, but that's all I remember. 13 Q You testified earlier about speaking with Matt 14 Durrett concerning his question about whether the report 15 should have been released in the first place and whether 16 the county should continue to release it. Do you recall 17 that generally? 18 A Yes. 19 Q Did you respond to Mr. Durrett's inquiry in 20 writing? 21 A I don't remember. There's a real good chance 22 that I didn't given the fact that I was in North Little 23 Rock on guard duty and this was sort of a triage operation 24 at the moment. 25 Q Do you still have copies of any e-mails or text</p>
<p style="text-align: right;">Page 34</p> <p>1 MR. OWENS: Object to form. 2 A Armed with the information I had after the fact, 3 yes, that would have been my advice. 4 Q (BY MR. BLEDSOE) Now, the next sentence of the 5 news article which is marked as Exhibit 31 says, "'I don't 6 know the sequence of events of what happened to get it 7 released. I'm looking into it myself,' Zega said." Do 8 you see that? 9 A Yes. 10 Q What did you learn of the sequence of events 11 that happened to get the incident report released? 12 A When I got back from North Little Rock from 13 guard duty, I had a meeting with Rick Hoyt, Kelly 14 Cantrell, I think her husband, Jay, who was the chief 15 deputy, Jay Cantrell was the chief deputy at the sheriff's 16 office, and I either met with Sheriff Helder then or at a 17 meeting sort of immediately after where we discussed what 18 happened. This is -- the meeting with Major Hoyt was the 19 one in which I said -- he said to me, basically, there 20 are, you know, dozens of FOIA requests a week, Steve. If 21 you -- if we sent every one of them to you, you're going 22 to do nothing but tell us whether to release or not, 23 that's all you're going to do all day. What I learned was 24 that the sheriff's office gets multiple Freedom of 25 Information Act requests a day and that their policy,</p>	<p style="text-align: right;">Page 36</p> <p>1 messages you exchanged with Matt Durrett or anyone else in 2 the county in connection with the release of the incident 3 report that's at issue in this case? 4 A I know I don't have e-mails. I would have to 5 check my phone for texts, but the e-mail -- all my e-mails 6 when I ceased being county attorney resided there. I 7 didn't bring them with me. 8 Q And you didn't delete any of those e-mails while 9 you were county attorney, correct? 10 A You are correct. No, sir, I didn't delete 11 e-mails. 12 Q And you didn't delete any text messages 13 purposely, correct? 14 A That is correct. 15 Q Have you looked to see if you had any text 16 message exchanges with Matt Durrett or anyone else at the 17 county in connection with the release of the incident 18 report? 19 A No. 20 Q We'll ask you to do that. I'm not going to bust 21 anybody's chops right now, but, Jason, if you will follow 22 up with that, we would appreciate it. 23 All right. Prior to May 2015, were you aware 24 there had been an investigation concerning Josh Duggar 25 molesting his sisters --</p>

<p style="text-align: right;">Page 37</p> <p>1 A No.</p> <p>2 Q -- years earlier?</p> <p>3 A No.</p> <p>4 Q Is it true that you first learned about that in</p> <p>5 connection with the release of the incident reports?</p> <p>6 A That is correct.</p> <p>7 Q I'm going to read you and we'll put it on the</p> <p>8 screen, but I'm going to read you part of an interrogatory</p> <p>9 response that you made in this case and I just want to ask</p> <p>10 you some questions about that. So referring to your</p> <p>11 interaction with the Don Lemon and CNN in early June 2015,</p> <p>12 it says, "Shortly after that appearance," this is your</p> <p>13 response to interrogatory number 15, by the way, so it</p> <p>14 says, "Shortly after that appearance, Kelly Cantrell, the</p> <p>15 public information officer of the sheriff's office,</p> <p>16 contacted me to express her displeasure at what I said.</p> <p>17 Kelly and her husband, Jay, who is the city deputy</p> <p>18 sheriff, are long-time friends of mine and I went to see</p> <p>19 Kelly as soon as I could to apologize for the way I</p> <p>20 handled myself. I also went to Sheriff Helder in a</p> <p>21 separate meeting and apologized to him." So I'm going to</p> <p>22 ask you some questions about that, okay?</p> <p>23 A Okay.</p> <p>24 Q Is the statement that is referred to that Kelly</p> <p>25 Cantrell is unhappy with your statement that, "If I could</p>	<p style="text-align: right;">Page 39</p> <p>1 A I -- I don't remember the details, Mr. Bledsoe.</p> <p>2 What I remember is she was unhappy with me because it made</p> <p>3 it seem like the sheriff's office had done something wrong</p> <p>4 in releasing the information.</p> <p>5 Q But at the time, you did believe the sheriff's</p> <p>6 office had done something wrong in releasing the</p> <p>7 information, correct?</p> <p>8 A That's correct, a mistake. I want to be clear</p> <p>9 about that. I believe they made a mistake, not a -- you</p> <p>10 know, there was no plot to, that I was ever aware of, to</p> <p>11 hurt somebody.</p> <p>12 Q I'm going to move to strike after that is</p> <p>13 correct as nonresponsive, but that's for the judge.</p> <p>14 Do you recall anything else Kelly Cantrell told</p> <p>15 you about being unhappy with the statements you had made</p> <p>16 to Don Lemon on CNN?</p> <p>17 A No.</p> <p>18 Q And did you apologize to Ms. Cantrell?</p> <p>19 A Yes.</p> <p>20 Q Why did you apologize?</p> <p>21 A Because I could have handled myself and simply</p> <p>22 not commented to the press and it would have -- I made a</p> <p>23 mistake in going on Don, I could have told him no. I</p> <p>24 should have told him no.</p> <p>25 Q When you said you made a mistake, you believe</p>
<p style="text-align: right;">Page 38</p> <p>1 build a time machine, this wouldn't have come out the</p> <p>2 first place?"</p> <p>3 MR. OWENS: Object to form.</p> <p>4 A I don't remember. Mr. Bledsoe, I know she was</p> <p>5 angry with me in general about my CNN appearance and</p> <p>6 comments.</p> <p>7 Q (BY MR. BLEDSOE) So did you actually make an</p> <p>8 appearance on the Don Lemon show?</p> <p>9 A Yes.</p> <p>10 Q And do you recall generally what you told Don</p> <p>11 Lemon during that appearance?</p> <p>12 A Generally, I told him that we did not -- we</p> <p>13 should not -- we, the county, should not have released the</p> <p>14 report, that we were not going to repeat that mistake in</p> <p>15 relation to other outlets. He probably asked -- I'm not</p> <p>16 going to speculate. That's the general gist of it.</p> <p>17 Everything that I've told you today is I don't think we</p> <p>18 should have released the report and we were not going to</p> <p>19 repeat the mistake of releasing it again.</p> <p>20 Q And after you made those statements to Don</p> <p>21 Lemon, is it true that Kelly Cantrell, the public</p> <p>22 information officer for the sheriff's office, contacted</p> <p>23 you to express her displeasure with what you said?</p> <p>24 A Yes.</p> <p>25 Q What did Ms. Cantrell tell you?</p>	<p style="text-align: right;">Page 40</p> <p>1 you made a mistake by talking to Don Lemon at all about</p> <p>2 this issue?</p> <p>3 A Yes.</p> <p>4 Q And why do you believe it was a mistake to talk</p> <p>5 to Don Lemon about the issue?</p> <p>6 A Because it inflamed the -- well, one, it</p> <p>7 inflamed my relationship with people I like an awful lot,</p> <p>8 I trust and had a really good working relationship at the</p> <p>9 sheriff's office; two, it wasn't necessary to do the job.</p> <p>10 Q And did you also apologize to Sheriff Helder?</p> <p>11 A Yes.</p> <p>12 Q And why did you apologize to Sheriff Helder?</p> <p>13 A Because, you know, he's the elected official.</p> <p>14 Tim's a longtime friend of mine, somebody for whom I have</p> <p>15 an awful lot of respect in a really, really difficult job</p> <p>16 and I liked him and it was the same reasons that I</p> <p>17 apologized to Kelly first and then apologized to the</p> <p>18 sheriff, I want to say two or three days later.</p> <p>19 Q At any time during the second half of May or the</p> <p>20 June 2015 time frame, did anyone at the county sheriff's</p> <p>21 office ever express regret to you for having released the</p> <p>22 incident report?</p> <p>23 A I don't remember.</p> <p>24 Q At any time during -- you know, after May --</p> <p>25 well, withdrawn.</p>

<p style="text-align: right;">Page 41</p> <p>1 At any time between May 2015 and the end of</p> <p>2 June, for example, 2015, did anyone at the sheriff's</p> <p>3 office apologize or admit that they had made a mistake in</p> <p>4 releasing the incident report?</p> <p>5 A So it seems to me there are two parts to that</p> <p>6 question.</p> <p>7 Q Well, let me ask you -- that's fair, so I'm</p> <p>8 going to sustain your objection, not that you made an</p> <p>9 objection.</p> <p>10 A I'm not making an objection, I'm a witness.</p> <p>11 Q I know, I'm kidding. But at any time between</p> <p>12 May 20, 2015 and the end of June 2015, did anyone at the</p> <p>13 county sheriff's department ever tell you that you were</p> <p>14 right, they had made a mistake in releasing the incident</p> <p>15 report?</p> <p>16 A I don't remember words like that, no.</p> <p>17 Q What do you remember?</p> <p>18 A I remember what I told you before, Mr. Bledsoe,</p> <p>19 which is whenever -- it's sort of a remedial thing going</p> <p>20 forward, whenever there was a report that involved a child</p> <p>21 victim, a child survivor or even a child witness and that</p> <p>22 report was the subject of a Freedom of Information Act</p> <p>23 request, Kelly, in particular, would reach out to me</p> <p>24 whenever and say, Steve, I've got this, should we release</p> <p>25 it. And so the behavior changed at the sheriff's office,</p>	<p style="text-align: right;">Page 43</p> <p>1 questions. Thank you for your time, Mr. Zega. And go</p> <p>2 Army.</p> <p>3 THE WITNESS: Thank you. Beat Navy.</p> <p>4 MR. BLEDSOE: Although, I do have a good friend</p> <p>5 who played quarterback at Navy for a couple years.</p> <p>6 THE COURT REPORTER: Are we off or did anyone</p> <p>7 else have questions?</p> <p>8 MR. OWENS: I'll reserve.</p> <p>9 (DEPOSITION CONCLUDED AT 11:31 A.M.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 42</p> <p>1 but not -- I don't remember anybody ever saying we messed</p> <p>2 this up. I don't know that it didn't happen either. My</p> <p>3 concern during that whole mess was how can I repair, if I</p> <p>4 could repair, the relationships I had with good people at</p> <p>5 the sheriff's office.</p> <p>6 Q And you felt like you needed to repair</p> <p>7 relationships with people you had at the sheriff's office</p> <p>8 because you had probably said that releasing the incident</p> <p>9 report was a mistake and they were unhappy with that,</p> <p>10 correct?</p> <p>11 A Mr. Bledsoe, I'll stand on my former testimony</p> <p>12 with that. I felt like I needed to apologize, one,</p> <p>13 because, frankly, I pissed them off and, two, because I as</p> <p>14 a practical matter besides the fact that they were friends</p> <p>15 of mine whose friendship and relationships I value</p> <p>16 professionally, it was imperative to me to have a good</p> <p>17 working, trusting relationship with them and, as I said, I</p> <p>18 could have done the job without going on Don Lemon to talk</p> <p>19 about we had screwed up.</p> <p>20 MR. BLEDSOE: Let me check with my colleagues</p> <p>21 here. Let's just take about two minutes and then I think</p> <p>22 we'll be -- we'll finish up, okay?</p> <p>23 THE WITNESS: Very well.</p> <p>24 (Short break from 11:30 a.m. to 11:31 a.m.)</p> <p>25 MR. BLEDSOE: I don't have any further</p>	<p style="text-align: right;">Page 44</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 I, Kerri Pianalto, Certified Court Reporter, do</p> <p>4 hereby certify that the above-named STEVEN ZEGA was by me</p> <p>5 first duly sworn to testify the truth, the whole truth, and</p> <p>6 nothing but the truth, in the case aforesaid; that the above</p> <p>7 and foregoing deposition was by me taken and transcribed</p> <p>8 pursuant to agreement, and under the stipulations</p> <p>9 hereinbefore set out; and that I am not an attorney for</p> <p>10 nor relative of any of said parties or otherwise</p> <p>11 interested in the event of said action.</p> <p>12 IN WITNESS WHEREOF, I have hereunto set my hand</p> <p>13 and official seal this 15th day of September, 2021.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">KERRI PIANALTO, CCR State of Arkansas, No. 651</p>

Steven Zega

City of Springdale

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1 DECLARATION UNDER PENALTY OF PERJURY

2 Case Name: Dillard vs. City of Springdale

3 Date of Deposition: 09/09/2021

4 Job No.: 10087128

5

6 I, STEVEN ZEGA, hereby certify

7 under penalty of perjury under the laws of the State of

8 _____ that the foregoing is true and correct.

9 Executed this _____ day of

10 _____, 2021, at _____.

11

12

13 _____

14 STEVEN ZEGA

15

16 NOTARIZATION (If Required)

17 State of _____

18 County of _____

19 Subscribed and sworn to (or affirmed) before me on

20 this _____ day of _____, 20____,

21 by _____, proved to me on the

22 basis of satisfactory evidence to be the person

23 who appeared before me.

24 Signature: _____ (Seal)

25

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1 DEPOSITION ERRATA SHEET

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20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 _____ Subject to the above changes, I certify that the

transcript is true and correct

23 _____ No changes have been made. I certify that the

transcript is true and correct.

24

25 _____

STEVEN ZEGA

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1 DEPOSITION ERRATA SHEET

2 Case Name: Dillard vs. City of Springdale

Name of Witness: Steven Zega

3 Date of Deposition: 09/09/2021

Job No.: 10087128

4 Reason Codes: 1. To clarify the record.

2. To conform to the facts.

3. To correct transcription errors.

5

6 Page _____ Line _____ Reason _____

7 From _____ to _____

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